Case 1-17-44842-cec Doc 2 Filed 09/19/17 Entered 09/19/17 11:38:56

UNITED STATES BANKRUPTCY COURT

Eastern District of New York

In re:

Richard Enrique Ulloa,

Case No. Chapter 7

Debtor(s)

STATEMENT PURSUANT TO ED LOCAL RULE 2017-1

Derrick Hanna, an attorney duly admitted to practice in this Court, states:

- 1. I am a member of the firm of Hanna & Vlahakis, the attorneys of record for the above-named debtor, and I have been retained as counsel in connection with the filing of a petition for bankruptcy under Chapter 7 of the United States Bankruptcy Code.
- 2. Prior to the filing of the petition herein, my firm rendered the following services to the above-named debtor:

<u>SERVICE</u>	<u>TIME</u>
Consultation, Analyses of Financial Condition and how to apply for Credit Counseling	2.00
Review of Documents	2.00
Prepare Bankruptcy Petition and Schedules	3.00
Preparation for 341 Meeting	0.50

- 3. That my law firm will also represent the debtor(s) at the first meeting of creditors. However, if Derrick Hanna or Mark Hanna are not available, outside counsel will be used to cover the representation of the Debtor(s) at the 341 Meeting.
- 4. That all services rendered prior to the filing of the petition herein were rendered personally by Derrick Hanna or Mark Hanna. All cases are supervised by Derrick Hanna or Mark Hanna.
- 5. That the usual rate of compensation of this firm is \$350.00 per hour however; we charge a flat rate of \$750.00 for individual Chapter 7 and \$1,000.00 for a joint Chapter 7 Bankruptcy. Pro-Bono Cases are not charged a fee, however approximately 7 hours are spent on each case. All bankruptcy cases including Pro-Bono Cases do not include the following services, in accordance with our retainer agreement:
 - a. An appearance for any adjourned Section 341 hearing.
 - b. Preparation or filing of a Reaffirmation Agreement.
 - c. Efforts made to release a restrained bank account or stop an income execution.
 - d. Preparation of any Amendment to the petition or schedules.
 - e. Motions to avoid liens on exempt property.
 - f. Motions pursuant to Bankruptcy Code Section 722 to redeem exempt personal property for liens.
 - g. Defense of any action taken by the Trustee or creditors to avoid preferences (Section 548) and/or pre/post petition transfers.
 - h. Defense of any action taken by the Trustee after the initial Section 341 hearing, including handling any extra document requests by the Trustee.

- i. Motions necessary to enforce the automatic stay against creditors (Section 362).
- j. Representation in any action or proceeding objecting to Debtor's discharged, objecting to the dischargeability of a particular debt of Debtor, or to revoke Debtor's discharge.
- k. Defense of any action taken by any party caused by the result of or that requires additional legal work because of Debtor's failure to disclose information, provide documents requested or comply with instructions given to Debtor regarding bankruptcy proceeding.
- 1. Restoring, correcting or rebuilding Debtor's credit rating or taking any steps to fix or correct Debtor's credit report.
- m. Defense of any action taken by a creditor concerning dischargeability of a debt.

Dated: August 28, 2017

/s/ Derrick Hanna Derrick Hanna HANNA & VLAHAKIS 7504 Fifth Avenue Brooklyn, NY 11209 Phone/Fax (718) 680 - 8400